### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

WASHINGTON MUTUAL BANK,	)
Plaintiff,	
v.	) CIVIL ACTION NO. 05-11686-WGY
DAN W. ADAMS, HEIDI K. ADAMS, UNITED STATES OF AMERICA, COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF REVENUE, DELTA FUNDING CORPORATION and BENEFICIAL MASSACHUSETTS INC.,	) ) ) ) ) ) ) ) )
Defendants.	) ) _)

## AFFIDAVIT OF J. PATRICK KENNEDY IN SUPPORT OF MOTION FOR AN AWARD OF ATTORNEYS' FEES AND COSTS

- I, J. Patrick Kennedy, hereby depose and state as follows:
- 1. I am an attorney and partner in the law firm of Bulkley, Richardson and Gelinas, LLP (the "Firm"), One Post Office Square, Suite 3700, Boston, Massachusetts. I joined the Firm as an attorney in 2003 and became a partner effective in January 2006. I was admitted to practice law in the Commonwealth of Massachusetts in 1994, and have been a member in good standing since admission. I am also admitted to practice in the United States District Court for the District of Massachusetts.
- 2. My practice is concentrated primarily in civil litigation matters, with a focus on representing banks, mortgage lenders and other financial institutions. I have represented commercial and individual clients in civil litigation matters in both State and Federal Courts.

- 3. Plaintiff Washington Mutual Bank (the "Plaintiff" or "WMB") retained the Firm's services in 2005 to represent its interest against Dan W. Adams and Heidi K. Adams, and any other interested party, in this mortgage lien reinstatement matter. The Firm subsequently opened a billing and reference number for the Plaintiff's case of 26021-00026.
- 4. I have prepared this affidavit in support of the Plaintiff's request for attorneys' fees and costs to be awarded against Dan W. Adams and Heidi K. Adams pursuant to the provisions of paragraph 7 of the mortgage executed by them, a copy of which was attached to the Complaint as <a href="Exhibit 3">Exhibit 3</a>. Count III of the Complaint is a claim for the award of attorneys' fees and costs.
- 5. It is the Firm's policy to assign responsibilities to attorneys and paraprofessionals based on the degree of experience and expertise required for the specific task. The Firm reviews the rates of the attorneys and paralegals on at least an annual basis. A number of attorneys and paraprofessionals were consulted or provided services to WMB in this matter. A summary of the individuals who provided services and their backgrounds follows:
  - (a) Donn A. Randall is a partner and has been associated with the Firm since

    2003. He was admitted to practice law in the State of New York in 1979

    and in the Commonwealth of Massachusetts in 1996, and has been a

    member in good standing in the bars of both states since that time. His practice is

    concentrated primarily in civil litigation, banking law, and employment

    litigation.
  - (b) Kathleen Bernardo is a partner and has been associated with the Firm since 1990.She was admitted to practice in the Commonwealth of Massachusetts in 1990, and

- has been a member in good standing since that time. Her practice is concentrated primarily in residential and commercial real estate matters.
- (c) Mary Ellen Manganelli is an attorney and has been associated with the

  Firm since 2004. She was admitted to practice law in the Commonwealth

  of Massachusetts in 1998, and has been a member of the bar in good

  standing since that time. Her practice is concentrated primarily in general

  litigation and she worked extensively on this matter before, during and after suit.
- (d) Katherine K. Coolidge is an attorney and holds a masters degree in library sciences. She was admitted to practice law in the Commonwealth of Massachusetts in 1985, and has been a member of the bar in good standing since that time. She joined the Firm in 2002 as the Firm's legal librarian and undertook citation checking and basic legal research in this matter.
- 6. Attached as Exhibit A to this affidavit is the Firm's statements for fees and costs for work actually billed to WMB. The billing entries relevant to the fees and costs in this matter are memorialized therein. Certain diary entries have been redacted in order to preserve the protection of attorney/client privilege and/or work product doctrine.
- 7. Our normal and customary practice for billing is that each person from the Firm who has provided billable legal services to the Plaintiff records his or her time and a detailed description of the services provided which is then entered into the Firm's computerized billing system. All of the attorneys and paraprofessionals who provided services in this matter recorded their time as shown on Exhibit A.

- 8. In order to determine what fees were related to the prosecution of the claims against Dan W. Adams and Heidi K. Adams, I reviewed the statements for services submitted herewith and have made certain adjustments as set forth in the statements.
- 9. A summary of the total hours spent by the attorneys and paralegals for legal work in this matter as adjusted, along with his or her applicable billing rates from 2005 to the present, is as follows:

NAME	HOURS	RATE/HOUR	TOTAL FEES
Kathleen L. Bernardo, Esq.	2.1	\$ 210.00	\$ 441.00
Donn A. Randall, Esq.	14.5	\$ 210.00	\$ 3,045.00
J. Patrick Kennedy, Esq.	48.8	\$ 195.00	\$ 9,516.00
J. Patrick Kennedy, Esq.	18.4	\$ 210.00	\$ 3,864.00
Mary Ellen Manganelli, Esq.	53.4	\$ 175.00	\$ 9,345.00
Katherine K. Coolidge, Esq.	1.8	\$ 100.00	\$ 180.00
TOTAL	139		\$26,391.00

- 10. The costs that WMB incurred and that we have determined were reasonably necessary to litigate this case to its conclusion, which included court filing fees, expenses for photocopying documents and exhibits, LEXIS and WestLaw research, mailing and other incidental expenses, are also itemized in Exhibit A. The total amount of those costs is \$2,077.75.
  - 11. The total amount of the attorneys' fees and costs is \$28,468.75.
- 12. All fees and costs as set forth in this affidavit and Exhibit A were actually and necessarily performed or incurred. All such attorneys' fees and costs were actually billed to WMB and were paid. Based on my experience and knowledge of the particular matters relating to this case, based on my general knowledge and experience in civil litigation, and based on my knowledge and familiarity with attorneys' and paralegals' rates in the area, the hourly rates

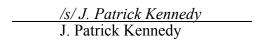
charged by Bulkley, Richardson and Gelinas, LLP, including the rates charged for the services herein, and the time spent on the matters at issue, were reasonable. Those rates were consistent with the rates charged in the community for similar work by legal professionals with similar experience.

Signed under the penalty of perjury this 3rd day of August, 2006.

/s/ J. Patrick Kennedy
J. Patrick Kennedy

### **CERTIFICATE OF SERVICE**

I, J. Patrick Kennedy, hereby certify that a true and correct copy of the foregoing document was served on all parties or counsel of record via this Court's CM/ECF system or, if not registered on this Court's CM/ECF system, then via first class mail, postage prepaid on this 3rd day of August, 2006.



Doc. # 407910

# EXHIBIT A

Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney
Originating Attorney
Responsible Attorney

075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli

### \*\*\*\* Time \*\*\*\* Thru 05/31/05

*							
Date	Attorney	Time	Rate	Value Diary	Print Bill	Add Total	No Chg
05/12/05	114 Mary Ellen Manganelli	0.50	175	87.50 Receipt and rev	view of new matter file Yes	Yes	No
05/12/05	114 Mary Ellen Manganelli	0.40	175	·	Ms. Croll regarding Yes	Yes	No
05/13/05	075 Donn A. Randall	0.80	210	168.00 Develop strateg	gy for recovery Yes	Yes	No
05/13/05	075 Donn A. Randall	0.40	210	84.00 Outline compla	int, causes of action Yes	Yes	No
05/13/05	075 Donn A. Randall	0.20	210	42.00 Analysis of rep	orting requirements Yes	Yes	No
05/13/05	105 Kathleen L. Bernardo	0.60	210		y to reinstate mortgage by Yes 4, Section 5B Affidavit	Yes	No
05/17/05	075 Donn A. Randall	0.80	210	168.00 Analysis of dra routing number		Yes	No
05/17/05	075 Donn A. Randall	0.40	210	84.00 Analysis of ava	illable causes of actions, Yes	Yes	No
05/17/05	114 Mary Ellen Manganelli	0.40	175	70.00 E-mails to and	from Ms. Croll regarding Yes	Yes	No
05/17/05	114 Mary Ellen Manganelli	0.50	175	87.50 Review recentl	y decided lis pendens Yes	Yes	No
05/17/05	114 Mary Ellen Manganelli	0.10	175		to Denise at Marsh, Yes ding expedited current n on Adams property	Yes	No
05/17/05	114 Mary Ellen Manganelli	0.30	175	52.50 Draft e-mail to	Denise at Marsh, Moriarty Yes edited current owner	Yes	No
05/17/05	114 Mary Ellen Manganelli	0.50	175	87.50 Draft Motion fo	or Approval of Lis Pendens Yes	Yes	No
05/18/05	114 Mary Ellen Manganelli	1.20	175	210.00 Research Mas affidavits unde	s case law regarding Yes r M.G.L. c. 183, sec. 5	Yes	No
05/18/05	114 Mary Ellen Manganelli	0.60	175	105.00 Confer with Mi collection of th pendens	r. Randall regarding Yes e draft, filing suit and lis	Yes	No
05/18/05	114 Mary Ellen Manganelli	0.30	175	52.50 E-mail to Ms. 0	Croll regarding	s Yes	No
05/18/05	114 Mary Ellen Manganelli	0.10	175	17.50 Draft Verified	Complaint Ye	s Yes	No
05/18/05	114 Mary Ellen Manganelli	0.40	175	70.00 Telephone cor regarding	nference with Mr. Horne Ye	s Yes	No

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### Case 1:05-cv-11686-WGY Document 39-2 Filed 08 Bulkley, Richardson and Gelinas, LLP - Boston Filed 08/03/2006 **Billed Billing Memorandum**

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney Responsible Attorney**  075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli

\*\*\*\* Time Thru 05/31/05

Date	Attorney	Time	Rate	Value [		Print Bill	Add Total	No Chg
05/18/05	114 Mary Ellen Manganelli	0.80	175	140.00	Telephone conferences with Mr. Horne	Yes	Yes	No
05/18/05	114 Mary Ellen Manganelli	2.10	175	367.50 F	Further drafting of Verified Complaint	Yes	Yes	No
05/19/05	071 Katherine K. Coolidge	0.30	100	30.00	Research on	Yes	Yes	No
05/19/05	114 Mary Ellen Manganelli	0.20	175	35.00 (	Draft e-mail to Ms. Croll confirming	Yes	Yes	No
05/19/05	114 Mary Ellen Manganelli	0.60	175	105.00	Further drafting of Verified Complaint	Yes	Yes	No
05/19/05	114 Mary Ellen Manganelli	1.80	175		Draft Motion for Real Estate Attachment/Lis Pendens	Yes	Yes	No
05/19/05	114 Mary Ellen Manganelli	0.20	175	35.00 H	Draft e-mail to Ms. Croll regarding	Yes	Yes	No
05/19/05	114 Mary Ellen Manganelli	0.20	175		Telephone conference with Denise at Marsh, Moriarty regarding status of current owner rundown on Adams property	Yes	Yes	No
05/19/05	114 Mary Ellen Manganelli	0.30	175		Review docket sheets and entries of the four lawsuits filed against Dan Adams	Yes	Yes	No
05/20/05	075 Donn A. Randall	1.20	210	252.00	Revise and redraft complaint	Yes	Yes	No
05/20/05	075 Donn A. Randall	0.50		105.00	Review and analysis of client documents	Yes	Yes	No
05/20/05	114 Mary Ellen Manganelli	0.50	175		Receipt and review of current owner rundown	Yes	Yes	No
05/20/05	114 Mary Ellen Manganelli	0.30	175	52.50	by Mr. Horne	Yes	Yes	No
05/20/05	114 Mary Ellen Manganelli	0.50	175		Draft e-mail to Ms. Croll to provide information	Yes	Yes	No
05/23/05	075 Donn A. Randall	1.10	210	231.00	Redraft and revise complaint	Yes	Yes	No
05/23/05	075 Donn A. Randall	0.30	210		Analysis of client documents regarding UCC filings	Yes	Yes	No
05/23/05	114 Mary Ellen Manganelli	0.50	175	87.50	E-mails to and from Mr. Horne regarding	Yes	Yes	No

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### Case 1:05-cv-11686-WGY Bulkley, Richardson and Gelinas, LLP - Boston **Billed Billing Memorandum**

Client 26021 Washington Mutual Bank Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney** Responsible Attorney 075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

#### \*\*\*\* Time Thru 05/31/05

Date	Attorney	Time	Rate	Value I		Print Bill	Add Total	No Chg
05/23/05	114 Mary Ellen Manganelli	0.40	175	70.00	E-mails to and from Ms. Croll regarding	Yes	Yes	No
05/24/05	075 Donn A. Randall	1.10	210		Revise memorandum for real estate attachment, motion for attachment	Yes	Yes	No
05/24/05	114 Mary Ellen Manganelli	0.30	175		Telephone conference with Mr. Horne regarding	Yes	Yes	No
05/24/05	114 Mary Ellen Manganelli	2.70	175		Draft Memorandum Of Law In Support of ExParte Motion for Real Estate Attachment	Yes	Yes	No
05/24/05	114 Mary Ellen Manganelli	1.40	175		Research Mass law regarding Declarations of Homestead and Real Estate Attachments	Yes	Yes	No
05/24/05	114 Mary Ellen Manganelli	1.20	175	210.00	Revising Verified Complaint and Motion for Real Estate Attachment	Yes	Yes	No
05/24/05	114 Mary Ellen Manganelli	0.40	175		Telephone conference with Mr. Horne regarding	Yes	Yes	No
05/25/05	114 Mary Ellen Manganelli	5.50	175	962.50	Travel to Barnstable County Superior Court to file complaint and for hearing on emergency motion for real estate attachment	Yes	Yes	No
05/25/05	114 Mary Ellen Manganelli	0.40	175	70.00	Draft correspondence to Barnstable Deputy Sheriff's Office regarding service of complaint and writ of attachment	Yes	Yes	No
05/26/05	114 Mary Ellen Manganelli	0.30	175	52.50	Telephone conference with Marsha from the Deputy Sheriff's Office regarding title information on the Adams property	Yes	Yes	No
05/31/05	075 Donn A. Randall	0.20	210	42.00	Review and analysis of new bogus check	Yes	Yes	No
05/31/05	114 Mary Ellen Manganelli	0.30	175	52.50	Telephone conference with Mr. Horne regarding	Yes	Yes	No
05/31/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of fax from Mr. Horne with	Yes	Yes	No
	Total For Month	34.30	0	6,246.00				
	Total Time	34.30	0	6,246.00	)			

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 4

### \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Prio	or Value	Cu Time	rrent Value	To Time	otal Value
075 Donn A. Randall	07/14/06	05/31/05			7.00	1,470.00	7.00	1,470.00
105 Kathleen L. Bernardo	07/14/06	05/13/05			0.60	126.00	0.60	126.00
01 Partner Totals					7.60	1,596.00	7.60	1,596.00
114 Mary Ellen Manganelli	07/14/06	05/31/05			26.40	4,620.00	26.40	4,620.00
02 Associate Totals					26.40	4,620.00	26.40	4,620.00
071 Katherine K. Coolidge	07/18/06	05/19/05			0.30	30.00	0.30	30.00
04 Paralegal Totals					0.30	30.00	0.30	30.00
Ç								
Totals					34.30	6,246.00	34.30	6,246.00

### \*\*\*\* Disbursements \*\*\*\* Thru 05/31/05

Class	Date	Attorney	Description	Amount	Print Bill
102 Filing Fee - Complaint				275.00	
104 Sheriff Fee				66.40	l

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> Bulkley, Richardson and Gelinas, LLP - Boston **Billed Billing Memorandum**

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004 **Responsible Attorney** 

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney**  075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

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#### \*\*\*\* Disbursements \*\*\*\* Thru 05/31/05

Class	Date	Attorney	Description	Amount	Print Bill
108 Travel	05/25/05 05/25/05 05/25/05	075 DAR	Vendor 910: Mary Ellen Manganelli, Voucher 39049 Trav Barnstable Reim	10.00 12.00 108.69	Yes
			108 Travel Total	130.69	
129 Photocopies				8.50	ı
186 Title Rundown				197.00	)
197 Summons				10.00	)
218 Writs				5.00	)
	Total Disbursement			692.5	9

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

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### \*\*\*\* Disbursement Summary \*\*\*\*

Class	Prior	Current	Total
102 Filing Fee - Complaint		275.00	275.00
104 Sheriff Fee		66.40	66.40
108 Travel		130.69	130.69
129 Photocopies		8.50	8.50
186 Title Rundown		197.00	197.00
197 Summons		10.00	10.00
218 Writs		5.00	5.00
Totals		692.59	692.59

 Total Time
 6,246.00

 Matter Total
 6,938.59

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 7

\*\*\*\* Time \*\*\*\*
Thru 06/30/05

Date	Attorney	Time	Rate	Value	Diary	Print Bill	Add Total	No Chg
06/02/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of returns of service from the Barnstable Deputy Sheriff's Office.	Yes	Yes	No
06/02/05	114 Mary Ellen Manganelli	0.20	175	35.00	Draft e-mail to Ms. Croll regarding	Yes	Yes	No
06/09/05	075 Donn A. Randall	0.30	210	63.00	Review and analysis of defendants' response to complaint	Yes	Yes	No
06/09/05	075 Donn A. Randall	0.30	210	63.00	Revise correspondence to Mr. Adams regarding pleadings	Yes	Yes	No
06/09/05	114 Mary Ellen Manganelli	0.30	175	52.50	Receipt and review of correspondence and pleadings from Mr. Adams	Yes	Yes	No
06/09/05	114 Mary Ellen Manganelli	0.40	175	70.00	Draft correspondence to Mr. Adams in response to his return of the pleadings and payment of the money order		Yes	No
06/13/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of e-mail from Ms. Croll regarding	Yes	Yes	No
06/14/05	114 Mary Ellen Manganelli	0.40	175	70.00	Draft Notice of Default and Acceleration to Mr. & Mrs. Adams	Yes	Yes	No
06/15/05	114 Mary Ellen Manganelli	0.10	175	17.50	Receipt and review of correspondence from Mr. Adams	Yes	Yes	No
06/21/05	075 Donn A. Randall	0.80	210	168.00	Review and analysis of defendant's pleadings	Yes	Yes	No
06/21/05	114 Mary Ellen Manganelli	0.40	175	70.00	Receipt and review of Letter Rogatory, Motion for Enlargement of Time and Request for Information from Mr. Adams	Yes	Yes	No
06/22/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of Clerk's Notice regarding the allowance of the defendant's motion for extension of time to answer the complaint		Yes	No
06/22/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of Clerk's Notice regarding the return of the documents Adams filed with the court	Yes	Yes	No
06/23/05	075 Donn A. Randall	0.40	210		O Analysis of Notary Public statement	Yes	Yes	No
06/23/05	075 Donn A. Randall	0.60	210	126.00	Review "pleadings" from Mr. Adams to determine effect	Yes	Yes	No

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 8

\*\*\*\* Time \*\*\*\* Thru 06/30/05

Date	Attorney	Time	Rate	Value Diary	Print Bill	Add Total	No Chg
06/28/05	071 Katherine K. Coolidge	1.50	100	150.00 Research on standard of proof for equitable subordination and on jurisdiction over Internal Revenue Service	Yes	Yes	No
	Total For Month	6.50		1,109.00			
	Total Time	6.50		7,355.00			

### \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Prior Time	Value	Cui Time	rent Value	To Time	otal Value
075 Donn A. Randall	07/14/06	06/23/05			2.40	504.00	2.40	504.00
01 Partner Totals		•			2.40	504.00	2.40	504.00
114 Mary Ellen Manganelli	07/14/06	06/22/05			2.60	455.00	2.60	455.00
02 Associate Totals					2.60	455.00	2.60	455.00
071 Katherine K. Coolidge	07/18/06	06/28/05			1.50	150.00	1.50	150.00
04 Paralegal Totals					1.50	150.00	1.50	150.00
Totals					6.50	1.109.00	6.50	1.109.00

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

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Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

Client 26021 Washington Mutual Bank

Date 07/20/06

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 9

\*\*\*\* Disbursements \*\*\*\*
Thru 06/30/05

Class	Date	Attorney	Description	Amount	Print Bill
101 Long Distance Telephone				0.12	
104 Sheriff Fee				193.70	
129 Photocopies				12.70	
169 Federal Express/UPS				18.12	!
Total Disbursement				224.64	ļ.

### \*\*\*\* Disbursement Summary \*\*\*\*

Prior	Current	Total
	193.70	193.70
	12.70	12.70
0.12		0.12
	18.12	18.12
0.12	224.52	224.64
	0.12	193.70 12.70 0.12 18.12

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Date 07/20/06 Bulkley, Richardson and Gelinas, LLP - Boston **Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney** Responsible Attorney 075 Donn A. Randali 099 Firm (Boston)

114 Mary Ellen Manganelli

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**Total Time** 1,109.00 Matter Total 1,333.64 Date 07/20/06

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

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Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli

### \*\*\*\* Time \*\*\*\* Thru 07/31/05

Date	Attorney	Time	Rate	Value		Print Bill	Add Total	No Chg
07/05/05	114 Mary Ellen Manganelli	0.30	175	52.50	Draft correspondence to Mr. Gibbs regarding his inability to represent Mr. Adams in the lawsuit.	Yes	Yes	No
07/05/05	114 Mary Ellen Manganelli	0.20	175		Receipt and review of correspondence from Mr. Gibbs regarding his appointment by Mr. Adams	Yes	Yes	No
07/05/05	114 Mary Ellen Manganelli	0.10	175	17.50	Receipt and review of further information from Mr. Gibbs	Yes	Yes	No
07/07/05	114 Mary Ellen Manganelli	1.10	175	192.50	Review Mass law regarding equitable subordination and mortgages discharged in error	Yes	Yes	No
07/07/05	114 Mary Ellen Manganelli	0.90	175	157.50	Review federal case law regarding suits against the federal government and waiver of sovereign immunity	Yes	Yes	No
07/12/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of correspondence and money order from Mr. Adams	Yes	Yes	No
07/14/05	103 J. Patrick Kennedy	1.00	195	195.00	Review pleadings and conduct research for drafting Complaint to reinstate first mortgage position	Yes	Yes	No
07/15/05	103 J. Patrick Kennedy	2.00	195	390.00	Conduct research regarding claim against IRS to reinstate mortgage	Yes	Yes	No
07/15/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of decision on motion for judgment on the pleadings	Yes	Yes	No
07/15/05	114 Mary Ellen Manganelli	0.20	175	35.00	Draft e-mail to Ms. Croll advising	Yes	Yes	No
07/20/05	103 J. Patrick Kennedy	0.80	195	156.00	Conduct research regarding	Yes	Yes	No
07/20/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of updated payoff figure	Yes	Yes	No
07/20/05	114 Mary Ellen Manganelli	0.30	175	52.50	D Telephone conference with Ms. Roscoe from the Hampden Superior Court regarding the entry of judgment	Yes	Yes	No
07/20/05	114 Mary Ellen Manganelli	0.50	) 175	87.50	Draft correspondence to Ms. Roscoe at the Hampden County Superior Court regarding payoff and legal fees for the entry of judgment	Yes	Yes	No

Date 07/20/06

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

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114 Mary Ellen Manganelli

Page 12

\*\*\*\* Time \*\*\*\*
Thru 07/31/05

Date	Attorney	Time	Rate	Value	Diary	Print Bill	Add Total	No Chg
07/20/05	114 Mary Ellen Manganelli	0.20	175		Receipt and review of court notice regarding pleadings returned to Mr. Adams	Yes	Yes	No
07/26/05	103 J. Patrick Kennedy	5.80	195		Draft, review and revise Complaint to restore first mortgage position in the property	Yes	Yes	No
07/26/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of motion to enlarge time	Yes	Yes	No
07/26/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of e-mail from Mr. Horne regarding	Yes	Yes	No
07/26/05	114 Mary Ellen Manganelli	0.20	175	35.00	Draft e-mail to Ms. Clugh seeking recording information for Writ of Attachment	Yes	Yes	No
07/28/05	075 Donn A. Randall	1.60	210	336.00	Redraft complaint to re-establish lien position	Yes	Yes	No
07/28/05	103 J. Patrick Kennedy	1.50	195	292.50	Review and revise complaint to restore first mortgage position	Yes	Yes	No
07/28/05	103 J. Patrick Kennedy	0.70	195	136.50	Review and analyze email correspondence from client regarding	Yes	Yes	No
	Total For Month	18.40		3,512.00				
	Total Time	18.40		10,867.00				

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 13

\*\*\*\* Attorney Summary \*\*\*\*

	Last	Last	Prior		Current		Total	
Attorney	Diary	Entry	Time	Value	Time	Value	Time	Value
075 Donn A. Randall	07/14/06	07/28/05			1.60	336.00	1.60	336.00
103 J. Patrick Kennedy	07/14/06	07/28/05			11.80	2,301.00	11.80	2,301.00
01 Partner Totals					13.40	2,637.00	13.40	2,637.00
114 Mary Ellen Manganelli	07/14/06	07/26/05			5.00	875.00	5.00	875.00
02 Associate Totals					5.00	875.00	5.00	875.00
Totals					18.40	3,512.00	18.40	3,512.00

### \*\*\*\* Disbursements \*\*\*\* Thru 07/31/05

Class	Date	Attorney	Description	Amount	Print Bill
102 Filing Fee - Complaint				250.00	
129 Photocopies				5.30	
164 Delivery Service	07/28/05	075 DAR	Vendor 789: Social Law Library, Voucher 40103 #26021-26	17.60	Yes
		16	64 Delivery Service Total	17.60	)

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004 In House Counsel: Leigh Ann Lucero Billing Attorney
Originating Attorney
Responsible Attorney

075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

\*\*\*\* Disbursements \*\*\*\*
Thru 07/31/05

Class	Date	Attorney	Description	Amount	Bill		
252 Westlaw Computer Research				1.83			
Total Disbursement				274.73			

### \*\*\*\* Disbursement Summary \*\*\*\*

Class	Prior	Current	Total
102 Filing Fee - Complaint		250.00	250.00
129 Photocopies		5.30	5.30
164 Delivery Service		17.60	17.60
252 Westlaw Computer Research	1.83		1.83
Totals	1.83	272.90	274.73

Total Time 3,512.00 Matter Total 3,786.73

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney
Originating Attorney
Responsible Attorney

075 Donn A. Randali 099 Firm (Boston) 114 Mary Ellen Manganelli

### \*\*\*\* Time \*\*\*\* Thru 08/31/05

Date	Attorney	Time	Rate	Value	Diary	Print Bill	Add Total	No Chg
08/01/05	103 J. Patrick Kennedy	4.70	195		Review and revise Complaint to restore first mortgage position and prepare for filing in U.S. District Court	Yes	Yes	No
08/02/05	103 J. Patrick Kennedy	0.70	195	136.50	Review and revise Complaint to restore first mortgage position	Yes	Yes	No
08/02/05	103 J. Patrick Kennedy	0.30	195	58.50	E-mail correspondence to client regarding	Yes	Yes	No
08/02/05	114 Mary Ellen Manganelli	0.50	175	87.50	Draft Motion to Stay Barnstable Superior Court action	Yes	Yes	No
08/04/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of	Yes	Yes	No
08/09/05	075 Donn A. Randall	1.10	210	231.00	Review and revise complaint	Yes	Yes	No
08/09/05	103 J. Patrick Kennedy	1.00	195		Revise Complaint to restore first mortgage position and prepare to file in U.S. District Court	Yes	Yes	No
	114 Mary Ellen Manganelli	0.40	175	70.00	E-mails to and from Ms. Croll regarding	Yes	Yes	No
08/15/05	103 J. Patrick Kennedy	0.30	195	58.50	Telephone conference with Ms. Brunson regarding	Yes	Yes	No
	103 J. Patrick Kennedy	1.70	195	331.50	Final review and revisions to Complaint and attention to filing same	Yes	Yes	No
08/29/05	075 Donn A. Randall	0.30	210	63.00	Telephone conference with Mr. Carroll regarding service of complaint on IRS	Yes	Yes	No
08/30/05	103 J. Patrick Kennedy	0.50	195	97.50	Review completed proofs of service and electronic filings in U.S. District Court	Yes	Yes	No
08/30/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of notice from Mr. Adams demanding \$10 million in settlement of his claim	Yes	Yes	No
08/30/05	114 Mary Ellen Manganelli	0.30	175	52.50	Receipt and review of answer to the Verified Complaint	Yes	Yes	No
08/30/05	114 Mary Ellen Manganelli	0.30	175	52.50	Draft e-mail to Ms. Croll	Yes	Yes	No
08/30/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of returns of service on all corporate and municipal defendants	Yes	Yes	No

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 16

\*\*\*\* Time \*\*\* Thru 08/31/05

Date	Attorney	Time	Rate	Value	Diary	Print Bill	Add Total	No Chg
08/31/05	103 J. Patrick Kennedy	0.50	195	97.50	Review completed proofs of service and Office Conf. with Ms. Manganelli regarding status of same	Yes	Yes	No
	Total For Month	13.20		2,553.00				
	Total Time	13.20		13,420.00				

### \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Pri Time	or Value	Cu Time	rrent Value	To Time	otal Value
075 Donn A. Randall 103 J. Patrick Kennedy	07/14/06 07/14/06				1.40 9.70	294.00 1,891.50	1.40 9.70	294.00 1,891.50
01 Partne 114 Mary Ellen Manganelli	r Totals 07/14/06	08/30/05			11.10 2.10	2,185.50 367.50	11.10 2.10	2,185.50 367.50
02 Associ	ate Totals				2.10	367.50	2.10	367.50
Totals					13.20	2,553.00	13.20	2,553.00

Date 07/20/06

Bulkley, Richardson and Gelinas, LLP - Boston
Billed Billing Memorandum

DIN ALL DESCRIPTION AND COLUMN

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 17

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### \*\*\*\* Disbursements \*\*\*\* Thru 08/31/05

Class	Date	Attorney	Description	Amount	Print Bill
101 Long Distance Telephone				0.96	
104 Sheriff Fee				283.86	
129 Photocopies				56.00	
141 Postage				27.27	•
199 -	08/03/05	075 DAR	Vendor 789: Social Law Library, Voucher 40209 Overdue Book Fees	4.00	) Yes
		1	99 - Total	4.00	)
Total Disburseme	ent			372.09	9

\*\*\*\* Disbursement Summary \*\*\*\*

Class Prior Current Total

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 18

### \*\*\*\* Disbursement Summary \*\*\*\*

Class	Prior	Current	Total
104 Sheriff Fee		283.86	283.86
129 Photocopies		56.00	56.00
101 Long Distance Telephone		0.96	0.96
141 Postage		27.27	27.27
199 -		4.00	4.00
Totals		372.09	372.09

 Total Time
 2,553.00

 Matter Total
 2,925.09

Date 07/20/06

### Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004 In House Counsel: Leigh Ann Lucero Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randali 099 Firm (Boston) Page 19

ey 114 Mary Ellen Manganelli

\*\*\*\* Time \*\*\*\* Thru 09/30/05

Date	Attorney	Time	Rate	Value		Print Bill	Add Total	No Chg
09/01/05	075 Donn A. Randall	0.40	210		Telephone conference with counsel for IRS regarding service procedure.	Yes	Yes	No
09/02/05	103 J. Patrick Kennedy	0.50	195		Review completed proofs of service and draft letter to Court for filing same	Yes	Yes	No
09/02/05	103 J. Patrick Kennedy	0.40	195	78.00	Telephone conference with counsel for IRS regarding service issues and merits of claim	Yes	Yes	No
09/08/05	103 J. Patrick Kennedy	0.80	195	156.00	Review electronic filings and notices from U.S. District Court in case to restore first mortgage position	Yes	Yes	No
09/08/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of returns of service on the various defendants	Yes	Yes	No
09/08/05	114 Mary Ellen Manganelli	0.20	175	35.00	Review Affidavit of Service	Yes	Yes	No
09/08/05	114 Mary Ellen Manganelli	0.30	175	52.50	Draft Request for Default against the Adams and Delta Funding Corporation	Yes	Yes	No
09/12/05	103 J. Patrick Kennedy	0.40	195	78.00	Telephone conference with counsel for Mass. DOR regarding extension to respond to Complaint and merits	Yes	Yes	No
09/12/05	103 J. Patrick Kennedy	0.60	195	117.00	Review electronic notices and filings from U.S. District Court in action to reinstate first mortgage position	Yes	Yes	No
09/13/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of request for default against Beneficial Massachusetts	Yes	Yes	No
09/13/05	114 Mary Ellen Manganelli	0.20	175	35.00	Telephone conference with the Sandwich Assessor's Office regarding the assessed value of the Adams home		Yes	No
09/13/05	114 Mary Ellen Manganelli	0.40	175	70.00	Confer with Attorney Kennedy regarding his conversations with the Mass Dept of Revenue	Yes	Yes	No
09/13/05	114 Mary Ellen Manganelli	0.30	) 175	52.50	Receipt and review of Rule 9A Certificate of Compliance and correspondence to court enclosing Motion for Stay of Barnstable action	Yes	Yes	No
09/15/05	114 Mary Ellen Manganelli	0.20	175	35.00	Receipt and review of documents returned to me by Mr. Adams	Yes	Yes	No

Date 07/20/06

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

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\*\*\*\* Time \*\*\*\* Thru 09/30/05

Date	Attorney	Time	Rate	Value i		Print Bill	Add Total	No Chg	
09/19/05	103 J. Patrick Kennedy	0.50	195	,	Review filings and papers returned by Mr. Adams and electronic orders regarding response deadlines	Yes	Yes	No	
09/20/05	103 J. Patrick Kennedy	0.40	195		Review electronic filings regarding response deadlines	Yes	Yes	No	
<del>99/22/95</del> -	-073 Carol E. Kamm	<del>0.70-</del>	<del>-195</del>	+	Research severeign immunity issues regarding ability to sue state government - in federal court	Yes -	- Pos -	<del>-No</del>	No Charge
09/22/05	103 J. Patrick Kennedy	0.30	195		Telephone conferences with counsel for IRS and Mass. DOR regarding merits	Yes	Yes	No	
09/22/05	103 J. Patrick Kennedy	0.30	195		Office conference with Ms. Manganelli regarding drafting motion to continue period for seeking default judgment	Yes	Yes	No	
09/22/05	114 Mary Ellen Manganelli	1.20	175		Draft Motion to Exten Time to Seek Default Judgment	Yes	Yes	No	
09/22/05	114 Mary Ellen Manganelli	0.50	175		Draft Affidavit of Mary Ellen Manganelli in support of Motion to Extend Time to Seek Default Judgment		Yes	No	
09/22/05	114 Mary Ellen Manganelli	0.20	175	35.00	Telephone call to Judge Young's Clerk regarding the time period for the Dept of Revenue to answer the complaint	Yes	Yes	No	
09/23/05	103 J. Patrick Kennedy	0.30	195	58.50	Review electronic filings and court's Order regarding the answer deadline for the Commonwealth of Massachusetts	Yes	Yes	No	
09/27/05	103 J. Patrick Kennedy	0.20	195	39.00	Telephone conference with counsel for IRS regarding merits	Yes	Yes	No	
09/28/05	103 J. Patrick Kennedy	0.40	195	78.00	Review notice of disclaimer filed by Commonwealth of Massachusetts DOR in action to reinstate first mortgage position	Yes	Yes	No	
09/28/05	114 Mary Ellen Manganelli	0.20	175	35.00	Telephone conference with Ms. McAuliffor regarding the state's filing of a Notice of Disclaimer	e Yes	Yes	No	
09/28/05	114 Mary Ellen Manganelli	0.20	175	35.00	Draft e-mail to Ms. Croll regarding	Yes	Yes	No	

Date 07/20/06

### Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

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Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney
Originating Attorney

075 Donn A. Randall 099 Firm (Boston)

Responsible Attorney 114 Mary Ellen Manganelli

\*\*\*\* Time \*\*\* Thru 09/30/05

Date	Attorney	Time	Rate	Value Diary		Print Bill	Add Total	No Chg
09/28/05	114 Mary Ellen Manganelli	0.50	175	Seek Do	Motion for Extension of Time to efault Judgment and Affidavit of llen Manganelli	Yes	Yes	No
09/29/05	103 J. Patrick Kennedy	1.00	195	195.00 Review to seek	and revise motion to exend time default judgment for filing in o reinstate first mortgage position	Yes	Yes	No
09/29/05	103 J. Patrick Kennedy	0.40	195	·	one conferences with counsel for granting merits	Yes	Yes	No
09/29/05	114 Mary Ellen Manganelli	0.40	175	Washin time to	review and revision of agton Mutual's motion to extend seek default and Affidavit of Mary langanelli	Yes	Yes	No
	Total For Month	12.80		2,398.00				
	Total Time	12.80		15,818.00				

### \*\*\*\* Attorney Summary \*\*\*\*

	Last	Last	Prior		Current		Total	
Attorney	Diary	Entry	Time	Value	Time	Value	Time	Value
075 Donn A. Randall	07/14/06	09/01/05			0.40	84.00	0.40	84.00
103 J. Patrick Kennedy	07/14/06	09/29/05			6.50	1,267.50	6.50	1,267.50
01 Partner Totals					6.90	1,351.50	6.90	1,351.50

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 22

#### \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Prio Time	r Value	Cu Time	rrent Value	To Time	tal Value
114 Mary Ellen Manganelli	07/14/06	09/29/05			5.20	910.00	5.20	910.00
02 Associate Totals	07/14/06	09/22/05			5.20	910.00	5.20	910.00
073 Calor E. Raillin	07/14/06	09/22/05			0.70	136.50	0.70	136.50
03 Counsel Totals					0.70	136.50	0.70	136.50
Totals					12.80	2,398.00	12.80	2,398.00

### \*\*\*\* Disbursements \*\*\*\* Thru 09/30/05

Class	Date	Attorney	Description	Amount	Print Bill
101 Long Distance Telephone				0.30	
129 Photocopies				3.70	
Total Disbursement				4.00	

Case 1:05-cv-11686-WGY Document 39-2 Filed 08/03/2006 Page 24 of 30

Date 07/20/06 Bulkley, Richardson and Gelinas, LLP - Boston **Billed Billing Memorandum** 

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Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney Responsible Attorney**  075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

#### \*\*\*\* Disbursement Summary \*\*\*\*

Class	Prior	Current	Total	
129 Photocopies		3.70	3.70	
101 Long Distance Telephone		0.30	0.30	
Totals		4.00	4.00	
	Total Ti	me		2,398.00
	Matter 1	otal		2,402.00

Date 07/20/06

### Bulkley, Richardson and Gelinas, LLP - Boston **Billed Billing Memorandum**

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Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney Responsible Attorney**  075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

\*\*\*\* Time Thru 10/31/05

Date	Attorney	Time	Rate	Value		Print Bill	Add Total	No Chg
10/04/05	103 J. Patrick Kennedy	2.00	195		Review and revise motion to extend deadline for filing motion for default judgment and affidavit in support of same	Yes	Yes	No
10/04/05	114 Mary Ellen Manganelli	0.10	175	17.50	Receipt and review of Clerk's Notice regarding allowance of Motion to Stay state court proceedings	Yes	Yes	No
10/05/05	114 Mary Ellen Manganelli	0.20	175	35.00	Confer with Mr. Kennedy regarding Beneficial Massachusetts Notice of Appearance	Yes	Yes	No
10/17/05	075 Donn A. Randall	0.30	210	63.00	Analysis of IRS answer, position	Yes	Yes	No
10/17/05	103 J. Patrick Kennedy	0.80	195		Review Answer filed by U.S. Department of Justice	Yes	Yes	No
10/17/05	103 J. Patrick Kennedy	0.20	195	39.00	Telephone conference with counsel for DOJ regarding response to Complaint	Yes	Yes	No
10/18/05	114 Mary Ellen Manganelli	0.20	175	35.00	Confer with Mr. Kennedy regarding the IRS's answer to the complaint	Yes	Yes	No
10/20/05	103 J. Patrick Kennedy	0.30	195	58.50	Telephone call with counsel for DOJ regarding merits of action to reinstate first mortgage position	Yes	Yes	No
10/24/05	103 J. Patrick Kennedy	0.30	195	58.50	Telephone call to and message from counsel for DOJ regarding agreeing to relief sought in action to reinstate first mortgage position	Yes	Yes	No
10/26/05	114 Mary Ellen Manganelli	0.20	175	35.00	Draft e-mail to Ms. Croll regarding	Yes	Yes	No
	Total For Month	4.60		887.50				
	Total Time	4.60	)	16,705.50				

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**Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004 In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney** Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli

### \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Pri Time	ог Value	Cur Time	rent Value	Tot Time	al Value
075 Donn A. Randall 103 J. Patrick Kennedy	07/14/06 07/14/06	10/17/05 10/24/05			0.30 3.60	63.00 702.00	0.30 3.60	63.00 702.00
01 Partner Totals 114 Mary Ellen Manganelli	07/14/06	10/26/05			3.90 0.70	765.00 122.50	3.90 0.70	765.00 122.50
02 Associate Totals					0.70	122.50	0.70	122.50
Totals					4.60	887.50	4.60	887.50

#### \*\*\*\* Disbursements \*\*\*\* Thru 10/31/05

Class	Date	Attorney	Description	Amount	Print Bill
129 Photocopies				4.80	
252 Westlaw Computer Research				60.62	
Total Disbursement				65.42	

Case 1:05-cv-11686-WGY Document 39-2 Filed 08/03/2006 Page 27 of 30

Date 07/20/06 Bulkley, Richardson and Gelinas, LLP - Boston **Billed Billing Memorandum** 

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Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney Responsible Attorney**  075 Donn A. Randali 099 Firm (Boston)

114 Mary Ellen Manganelli

### \*\*\*\* Disbursement Summary \*\*\*\*

Class	Prior	Current	Total
129 Photocopies		4.80	4.80
252 Westlaw Computer Research	60.62		60.62
Totals	60.62	4.80	65.42

**Total Time** 887.50 Matter Total 952.92

Date 07/20/06

### Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

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Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004 In House Counsel: Leigh Ann Lucero Billing Attorney
Originating Attorney
Responsible Attorney

075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli

Thru 11/30/05

\*\*\*\* Time

Date	Attorney	Time	Rate	Value Diary	Prir Bill	t Add Total	No Chg
11/10/05	103 J. Patrick Kennedy	0.30	195	58.50 Review electronic fil District Court regard check	ing by clerk for U.S. Yes ing Adams' returned	Yes	No
11/20/05	114 Mary Ellen Manganelli	0.20	175	35.00 Draft e-mail to Ms. C	Croll Yes	Yes	No
11/21/05	103 J. Patrick Kennedy	0.50	195	97.50 Telephone conferen DOJ regarding non- requested relief and communications reg	opposition to email	Yes	No
11/30/05	103 J. Patrick Kennedy	0.30	195	58.50 Review electronic fil by Mr. and Mrs. Ada	•	Yes	No
	Total For Month	1.30		249.50			
	Total Time	1.30		16,955.00			

#### \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Pric	or Value	Cur Time	rent Value	To Time	tal Value
103 J. Patrick Kennedy	07/14/06	11/30/05			1.10	214.50	1.10	214.50
01 Partner Totals 114 Mary Ellen Manganelli	07/14/06	11/20/05			1.10 0.20	214.50 35.00	1.10 0.20	214.50 35.00
02 Associate Totals	<b>S</b>				0.20	35.00	0.20	35.00
Totals					1.30	249.50	1.30	249.50

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) Page 28

orney 114 Mary Ellen Manganelli

### \*\*\*\* Disbursements \*\*\*\* Thru 11/30/05

Class	Date	Attorney	Description	Amount	Print Bill
101 Long Distance Telephone				0.12	
129 Photocopies				19.60	
Total Disbursement				19.72	

### \*\*\*\* Disbursement Summary \*\*\*\*

Class	Prior	Current	Total
129 Photocopies		19.60	19.60
101 Long Distance Telephone		0.12	0.12
Totals		19.72	19.72

Total Time	249.50
Matter Total	269.22

Bulkley, Richardson and Gelinas, LLP - Boston **Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney Responsible Attorney**  075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

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\*\*\*\* Time Thru 12/31/05

Date	Attorney	Time	Rate	Value		Print Bill	Add Total	No Chg	
12/01/05	953 Jechua P. Crey	0.20	160	32.00	Telephone conference with Ms.	Yon	-Yon-	-No-	NO .
					Manganelli-regarding-drafting-of-court erder to reinstate mortgage		. 33		CHARGE
12/01/05	103 J. Patrick Kennedy	4.50	195	877.50	Draft and revise motion for judgment on pleadings in action to reinstate first mortgage position	Yes	Yes	No	
12/01/05	103 J. Patrick Kennedy	0.20	195	39.00	E-mail communications with client regarding	Yes	Yes	No	
12/02/05	075 Donn A. Randall	0.40	210	84.00	Revise motion for judgment on pleadings	Yes	Yes	No	
12/02/05	103 J. Patrick Kennedy	1.00	195	195.00	Draft and revise affidavit of James Horne in support of motion for judgment on pleadings	Yes	Yes	No	
	103 J. Patrick Kennedy	0.50	195	97.50	Review and revise motion for judgment on pleadings in action to reinstate first mortgage position	Yes	Yes	No	
12/02/05	103 J. Patrick Kennedy	2.00	195	390.00	Draft and revise motion for entry of default judgment	Yes	Yes	No	
12/02/05	103 J. Patrick Kennedy	1.80	195	351.00	Draft and revise Order to reinstate first mortgage position	Yes	Yes	No	
12/02/05	103 J. Patrick Kennedy	0.20	195	39.00	Reviewe electronic filing notice from federal court	Yes	Yes	No	
12/02/05	103 J. Patrick Kennedy	0.50	195	97.50	E-mail communications to and from client regarding	Yes	Yes	No	
12/05/05	103 J. Patrick Kennedy	1.40	195	273.00	Review and revise motion for judgment on pleadings and Order to reinstate first mortgage position	Yes	Yes	No	
12/05/05	103 J. Patrick Kennedy	1.20	195	234.00	Draft affidavit in support of motion for entry of default judgment	Yes	Yes	No	
12/05/05	103 J. Patrick Kennedy	0.40	195	78.00	E-mails to and from DOJ's counsel regarding assent to motion for judgment on pleadings	Yes	Yes	No	
12/06/05	103 J. Patrick Kennedy	0.50	195	97.50	Review and revise Order to reinstrate first mortgage position	t Yes	Yes	No	
12/08/05	103 J. Patrick Kennedy	1.90	195	370.50	Final review and revisions to motions for entry of default judgment and for judgment on pleadings, affidavits in support of same, and electronically file same	Yes	Yes	No	

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004 In House Counsel: Leigh Ann Lucero Billing Attorney
Originating Attorney
Responsible Attorney

075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 30

\*\*\*\* Time \*\*\*\* Thru 12/31/05

Date	Attorney	Time	Rate	Value		Print Bill	Add Total	No Chg
12/19/05	075 Donn A. Randall	0.40	210	84.00	Analysis of court order denying motion for judgment	Yes	Yes	No
	Total For Month	17.10		3,339.50				
	Total Time	17.10		20,294.50				

### \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Pri Time	or Value	Cu Time	rrent Value	Total Time Value	
075 Donn A. Randall	07/14/06	12/19/05			0.80	168.00	0.80	168.00
103 J. Patrick Kennedy	07/14/06	12/08/05			16.10	3,139.50	16.10	3,139.50
01 Partner Totals					16.90	3,307.50	16.90	3,307.50
053 Joshua P. Grey	07/18/06	12/01/05			0.20	32.00	0.20	32.00
02 Associate Totals					0.20	32.00	0.20	32.00
Totals					17.10	3,339.50	17.10	3,339.50

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004 In House Counsel: Leigh Ann Lucero Billing Attorney
Originating Attorney
Responsible Attorney

075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 31

\*\*\*\* Disbursements \*\*\*\*
Thru 12/31/05

Class	Date	Attorney	Description	Amount	Print Bill
101 Long Distance Telephone				0.60	•
129 Photocopies				11.00	)
Total Disbursement	t			11.60	)

Class	Prior	Current	Total
129 Photocopies		11.00	11.00
101 Long Distance Telephone	0.12	0.48	0.60
Totals	0.12	11.48	11.60

Total Time	3,339.50
Matter Total	3,351.10

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**Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney Responsible Attorney**  075 Donn A. Randali 099 Firm (Boston) 114 Mary Ellen Manganelli

\*\*\*\* Time Thru 01/31/06

Date	Attorney	Time	Rate	Value		Print Bill	Add Total	No Chg
01/03/06	103 J. Patrick Kennedy	0.20	210	42.00	Review electronic filing by defendant Dan W. Adams	Yes	Yes	No
01/03/06	114 Mary Ellen Manganelli	0.20	175	35.00	Telephone conference with Ms. Smith regarding the Order for recording at the Registry of Deeds	Yes	Yes	No
01/06/06	075 Donn A. Randall	0.20	210	42.00		Yes	Yes	No
01/09/06	103 J. Patrick Kennedy	0.50	210	105.00	Telephone conferences and email communications with counsel for DOJ and other parties regarding notice of scheduling conference	Yes	Yes	No
01/10/06	103 J. Patrick Kennedy	3.80	210	798.00	Draft, review and revise motion for leave from requirements of notice of scheduling conference and confer with other counsel regarding same	Yes	Yes	No
01/11/06	103 J. Patrick Kennedy	1.30	210	273.00	Review and revise motion for leave from requirements of notice of scheduling conference and electronically file same	Yes	Yes	No
01/11/06	103 J. Patrick Kennedy	0.20	210	42.00	Telephone conference with counsel for DOR regarding motion	Yes	Yes	No
	103 J. Patrick Kennedy	0.60	210	126.00	Telephone conferences with federal court clerk's office regarding initial scheduling conference and email communications with other counsel regarding same	Yes	Yes	No
01/19/06	103 J. Patrick Kennedy	0.70	210	147.00	Review federal court's electronic order cancelling Rule 16 conference and Office conference with Ms. Manganelli regarding communications with Mr.	Yes	Yes	No
01/19/06	114 Mary Ellen Manganelli	0.40	175	70.00	Adams E-mails to and from Mr. Horne, Ms. Saunders and Ms. Croll regarding	Yes	Yes	No
01/19/06	114 Mary Ellen Manganelli	0.50	175	87.50	Telephone conference with Mr. Adams regarding the status of the lawsuit	Yes	Yes	No

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**Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney Responsible Attorney**  075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli

### \*\*\*\* Time Thru 01/31/06

Date	Attorney	Time	Rate	Value		Print Bill	Add Total	No Chg
01/27/06	075 Donn A. Randall	0.40	210	84.00	Review court order regarding default, judgment	Yes	Yes	No
01/27/06	103 J. Patrick Kennedy	0.50	210	105.00	Telephone conferences with Judge Young's clerk regarding obtaining certified copy of first mortgage reinstatement order and review file for same	Yes	Yes	No
01/27/06	103 J. Patrick Kennedy	1.50	210	315.00	Conduct research regarding	Yes	Yes	No
01/30/06	103 J. Patrick Kennedy	0.40	210	84.00	E-mail communications with service for filing Order of reinstatement at Barnstable Country Registry of Deeds	Yes	Yes	No
01/30/06	103 J. Patrick Kennedy	0.40	210	84.00	E-mail communications with Ms.  Manganelli regarding Order of reinstatement and concluding case	Yes	Yes	No
01/30/06	114 Mary Ellen Manganelli	0.20	175	35.00	E-mails to and from Ms. Clough regarding title examiner to record original court order	Yes	Yes	No
01/31/06	103 J. Patrick Kennedy	1.20	210	252.00	Review certified Order of mortgage reinstatement and draft transmittal letter for filing same at Barnstable County Registry of Deeds	Yes	Yes	No
	Total For Month	13.20		2,726.50				
	Total Time	13.20		23,021.00				

Case 1:05-cv-11686-WGY Document 39-3 Filed 08/03/2006 Page 5 of 21

Bulkley, Richardson and Gelinas, LLP - Boston **Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney Responsible Attorney**  075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

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### \*\*\*\* Attorney Summary \*\*\*\*

Attorney		Last Diary	Last Entry	Prie Time	or Value	Cเ Time	ırrent Value	To Time	otal Value
075 Donn A. Rand 103 J. Patrick Ken		07/14/06 07/14/06	01/27/06 01/31/06			0.60 11.30	126.00 2,373.00	0.60 11.30	126.00 2,373.00
01 114 Mary Ellen Ma		07/14/06	01/30/06			11.90 1.30	2,499.00 227.50	11.90 1.30	2,499.00 227.50
02	2 Associate Totals					1.30	227.50	1.30	227.50
To	otals					13.20	2,726.50	13.20	2,726.50

### \*\*\*\* Disbursements \*\*\*\* Thru 01/31/06

Class	Date	Attorney	Description	Amount	Print Bill
101 Long Distance Telephone				0.30	
129 Photocopies				2.40	1
199 -	01/27/06	075 DAR	Vendor TEMP: Barnstable County , Voucher 44062, Check 284 Reinstate First Mortgage	75.00	Yes
	01/31/06	075 DAR	Vendor TEMP: Barnstable County , Voucher 44066, Check 286 Tax	1.00	) Yes
		1	99 - Total	76.0	0
Total Disbursem	ent			78.7	0

Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney
Originating Attorney
Responsible Attorney

075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

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### \*\*\*\* Disbursement Summary \*\*\*\*

Class	Prior	Current	Total
129 Photocopies		2.40	2.40
101 Long Distance Telephone		0.30	0.30
199 -		76.00	76.00
Totals		78.70	78.70

 Total Time
 2,726.50

 Matter Total
 2,805.20

**Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney**  075 Donn A. Randall 099 Firm (Boston)

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Responsible Attorney 114 Mary Ellen Manganelli

Time Thru 02/28/06

Date	Attorney	Time	Rate	Value		Print Bill	Add Total	No Chg
02/01/06	103 J. Patrick Kennedy	0.30	210	63.00	Telephone conferences with clerk's office and registry of deeds regarding filing reinstatement order	Yes	Yes	No
02/01/06	105 Kathleen L. Bernardo	0.50	210	105.00		Yes	Yes	No
02/01/06	105 Kathleen L. Bernardo	0.40	210	84.00	Telephone conference with Ms.  Manganelli regarding title at property and reinstatement of mortgage on Land Court property	Yes	Yes	No
02/01/06	114 Mary Ellen Manganelli	0.20	175	35.00	Telephone conference with Ms. Golder regarding approval of court order reinstating the mortgage	Yes	Yes	No
02/01/06	114 Mary Ellen Manganelli	0.40	175	70.00	Telephone conference with the Land Court regarding court approval of the order reinstating the mortgage	Yes	Yes	No
02/02/06	103 J. Patrick Kennedy	2.00	210	420.00	Review and revise land court petition to approve order of reinstatement for filing at registry of deeds	Yes	Yes	No
02/02/06	103 J. Patrick Kennedy	0.40	210	84.00	Office conferences with Ms. Manganelli regarding land court issues	Yes	Yes	No
02/02/06	105 Kathleen L. Bernardo	0.30	210	63.00	Telephone conference with Ms.  Manganelli regarding Land Court procedures	Yes	Yes	No
02/02/06	105 Kathleen L. Bernardo	0.30	210	63.00	Review samples of S Petitions for Land Court	Yes	Yes	No
02/02/06	114 Mary Ellen Manganelli	0.20	175	35.00	Telephone call to Mr. Williams at the Land Court	Yes	Yes	No
02/02/06	114 Mary Ellen Manganelli	1.60	175	280.00	Draft correspondence to Mr. Williams seeking approval of the Order from Judge Young	Yes	Yes	No
02/02/06	114 Mary Ellen Manganelli	0.40	175	70.00	Telephone conferences with Mr. Williams regarding petition for approval of Judge Young's Order	Yes	Yes	No
02/02/06	114 Mary Ellen Manganelli	1.20	175	210.00	Draft Petition for Approval of Order Reinstating the Mortgage	Yes	Yes	No

Date 07/20/06

Bulkley, Richardson and Gelinas, LLP - Boston **Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney** Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli

\*\*\*\* Time Thru 02/28/06

Date	Attorney	Time	Rate	Value	Diary	Print Bill	Add Total	No Chg
02/02/06	114 Mary Ellen Manganelli	0.30	175	52.50	Draft correspondence to the Land Court enclosing Petition for Approval of the Order Reinstating the Mortgage	Yes	Yes	No
02/02/06	114 Mary Ellen Manganelli	0.40	175	70.00	Gather and organize exhibits to the Petition for Approval of the Order Reinstating the Mortgage	Yes	Yes	No
02/02/06	114 Mary Ellen Manganelli	0.20	175	35.00	Revise Reaffirmation Statement	Yes	Yes	No
02/03/06	103 J. Patrick Kennedy	0.50	210	105.00	Telephone conferences with land court and email communications with Ms.  Manganelli regarding status of S petition	Yes	Yes	No
02/03/06	114 Mary Ellen Manganelli	0.10	175	17.50	E-mail to Ms. Croll and Ms. Brunson regarding	Yes	Yes	No
02/07/06	114 Mary Ellen Manganelli	0.20	175	35.00	E-mail to Ms. Clough regarding copy of Certificate of Title	Yes	Yes	No
02/07/06	114 Mary Ellen Manganelli	0.20	175	35.00	Return telephone call to Mr. DiPasquale at the Land Court regarding copy of Certificate of Title	Yes	Yes	No
02/07/06	114 Mary Ellen Manganelli	0.40	175	70.00	Receipt and review of copy of Certificate of Title; fax same to the Land Court	Yes	Yes	No
02/14/06	114 Mary Ellen Manganelli	0.30	175	52.50	Telephone conference with Mr. DiPasquale from the Land Court regarding case status	Yes	Yes	No
02/17/06	103 J. Patrick Kennedy	0.70	210	147.00	Telephone conference with Mr. Williams at Land Court	Yes	Yes	No
02/21/06	103 J. Patrick Kennedy	0.50	210	105.00	Check on Sient	Yes	Yes	No
02/21/06	114 Mary Ellen Manganelli	0.20	175	35.00	E-mails to and from Mr. Horne regarding	Yes	Yes	No
	Total For Month	12.20		2,341.50				
	Total Time	12.20	•	25,362.50				

Case 1:05-cv-11686-WGY Document 39-3 Filed 08 Bulkley, Richardson and Gelinas, LLP - Boston Filed 08/03/2006 Page 9 of 21

**Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney Responsible Attorney**  075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli Page 38

# \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Prid	or Value	Cu Time	rrent Value	To Time	otal Value
105 Kathleen L. Bernardo 103 J. Patrick Kennedy	07/14/06 07/14/06	02/02/06 02/21/06			1.50 4.40	315.00 924.00	1.50 4.40	315.00 924.00
01 Partner Totals 114 Mary Ellen Manganelli	07/14/06	02/21/06			5.90 6.30	1,239.00 1,102.50	5.90 6.30	1,239.00 1,102.50
02 Associate Totals					6.30	1,102.50	6.30	1,102.50
Totals					12.20	2,341.50	12.20	2,341.50

#### \*\*\*\* Disbursements \*\*\*\* Thru 02/28/06

Class	Date	Attorney	Description	Amount	Print Bill
101 Long Distance Telephone				0.48	
102 Filing Fee - Complaint				50.00	
129 Photocopies			•	18.50	

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**Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004 In House Counsel: Leigh Ann Lucero Billing Attorney
Originating Attorney
Responsible Attorney

075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

# \*\*\*\* Disbursements \*\*\*\* Thru 02/28/06

Class	Date	Attorney	Description	Print Amount Bill
164 Delivery Service	02/04/06	075 DAR	Vendor 814: Ground Express, Inc., Voucher 44492 Delivery Service	8.03 Yes
	02/04/06	075 DAR	Vendor 814: Ground Express, Inc., Voucher 44492 Delivery Service	8.03 Yes
		1	64 Delivery Service Total	16.06
169 Federal Express/UPS				34.42
Total Disburs	ement			119.46

Class	Prior	Current	Total
102 Filing Fee - Complaint		50.00	50.00
129 Photocopies		18.50	18.50
101 Long Distance Telephone		0.48	0.48
169 Federal Express/UPS		34.42	34.42
164 Delivery Service		16.06	16.06
Totals		119.46	119.46

Date 07/20/06

Bulkley, Richardson and Gelinas, LLP - Boston

Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney
Originating Attorney
Responsible Attorney

075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli

 Total Time
 2,341.50

 Matter Total
 2,460.96

Date 07/20/06

# Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

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Client 26021 Washington Mutual Bank

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney Originating Attorney Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli

# \*\*\*\* Time \*\*\*\* Thru 03/31/06

Date	Attorney	Time	Rate	Value	Diary	Print Bill	Add Total	No Chg
03/02/06	114 Mary Ellen Manganelli	0.20	175	35.00	Telephone call to Mr. Williams at the Land Court regarding approval of the Court Order from Judge Young	Yes	Yes	No
03/08/06	114 Mary Ellen Manganelli	0.20	175	35.00	E-mail to and from Mr. Horne regarding	Yes	Yes	No
03/08/06	114 Mary Ellen Manganelli	0.10	175	17.50	Telephone call to Mr. Williams regarding the status of the Land Court order	Yes	Yes	No
03/08/06	114 Mary Ellen Manganelli	0.20	175	35.00	Telephone conference with Mr. Williams regarding the status of the Land Court order	Yes	Yes	No
03/23/06	103 J. Patrick Kennedy	0.20	210	42.00	Telephone conference with Land Court regarding mortgage reinstatement order	Yes	Yes	No
03/23/06	114 Mary Ellen Manganelli	0.10	175	17.50	Telephone conference with Ms. Clough regarding documents for recording in Barnstable County	Yes	Yes	No
03/23/06	114 Mary Ellen Manganelli	0.20	175	35.00	Draft correspondence to Ms. Golder regarding recording of documents in Barnstable County	Yes	Yes	No
03/23/06	114 Mary Ellen Manganelli	0.10	175	17.50	E-mail to Ms. Brunson, Ms. Croll and Mr. Horne regarding	Yes	Yes	No
03/24/06	103 J. Patrick Kennedy	0.20	210	42.00	Review mortgage reinstatement Order from Land Court and send same for filing at Barnstable Country Registry of Deeds	Yes	Yes	No
03/28/06	114 Mary Ellen Manganelli	0.30	175	52.50	Telephone conferences with Ms. Clough regarding recording of the Order and Notice	Yes	Yes	No
03/28/06	114 Mary Ellen Manganelli	0.20	175	35.00	E-mail to Ms. Brunson, Ms. Croll and Mr. Horne regarding	Yes	Yes	No
	Total For Month	2.00		364.00	<del>-</del>			
	Total Time	2.00		25,726.50	1			

Case 1:05-cv-11686-WGY Document 39-3 Filed 08/Bulkley, Richardson and Gelinas, LLP - Boston Filed 08/03/2006 Page 13 of 21

**Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004 In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney** Responsible Attorney 075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

#### \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Prio Time	r Value	Cur Time	rent Value	To Time	tal Value
103 J. Patrick Kennedy	07/14/06	03/24/06			0.40	84.00	0.40	84.00
01 Partner Totals 114 Mary Ellen Manganelli	07/14/06	03/28/06			0.40 1.60	84.00 280.00	0.40 1.60	84.00 280.00
02 Associate Totals					1.60	280.00	1.60	280.00
Totals					2.00	364.00	2.00	364.00

#### \*\*\*\* Disbursements \*\*\*\* Thru 03/31/06

Class	Date	Attorney	Description	Amount	Print Bill
101 Long Distance Telephone				0.24	
129 Photocopies				0.50	
199 -	03/03/06	114 MEM	Vendor 865: Marsh, Moriarty, Ontell &, Voucher 45051 Services for Outside Counsel (Marsh, Moriarty, Ontell Golder, P.C.)	57.00	Yes
	03/23/06	075 DAR	Vendor 879: Barnstable County, Voucher 45116 Filing Fee Land Court	76.00	Yes
		19	99 - Total	133.00	)
Total Disbursem	ent			133.74	1

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**Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney**  075 Donn A. Randali 099 Firm (Boston)

Responsible Attorney 114 Mary Ellen Manganelli

Class	Prior	Current	Total
129 Photocopies		0.50	0.50
101 Long Distance Telephone		0.24	0.24
199 -		133.00	133.00
Totals		133.74	133.74

Total Time	364.00
Matter Total	497.74

Case 1:05-cv-11686-WGY Document 39-3 Filed 08/03/2006 Page 15 of 21

Bulkley, Richardson and Gelinas, LLP - Boston **Billed Billing Memorandum** 

075 Donn A. Randall **Billing Attorney Originating Attorney** 099 Firm (Boston)

114 Mary Ellen Manganelli

Heidi K. Adams - File No. 2005-130-786-064004 Responsible Attorney

In House Counsel: Leigh Ann Lucero

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Date 07/20/06

Client 26021 Washington Mutual Bank

\*\*\*\* Time Thru 04/30/06

Date	Attorney	Time	Rate	Value Dia		Print Bill	Add Total	No Chg
04/05/06	103 J. Patrick Kennedy	0.50	210		eview and revise memo to client	Yes	Yes	No
04/05/06	114 Mary Ellen Manganelli	0.10	175	Ва	eceipt and review of notice from arnstable County District Court egarding status of case	Yes	Yes	No
04/06/06	103 J. Patrick Kennedy	0.30	210		mail communications to and from client	Yes	Yes	No
04/06/06	114 Mary Ellen Manganelli	0.50	175		-mail to Ms. Brunson, Ms. Croll and Mr. orne regarding	Yes	Yes	No
04/30/06	114 Mary Ellen Manganelli	0.30	175	Co	raft correspondence to the Barnstable county Superior Court Clerk's Office in esponse to Notice of Status Review	Yes	Yes	No
04/30/06	114 Mary Ellen Manganelli	0.40	175	70.00 Dr	raft Response to Notice of Status leview	Yes	Yes	No
	Total For Month	2.10		395.50				
	Total Time	2.10		26,122.00				

# \*\*\*\* Attorney Summary \*\*\*\*

	Last	Last	Prior		Current		Total	
Attorney	Diary	Entry	Time	Value	Time	Value	Time	Value
103 J. Patrick Kennedy	07/14/06	04/06/06			0.80	168.00	0.80	168.00
01 Partner Totals					0.80	168.00	0.80	168.00

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Case 1:05-cv-11686-WGY Document 39-3 Filed 08, Bulkley, Richardson and Gelinas, LLP - Boston Filed 08/03/2006 Page 16 of 21

**Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney Responsible Attorney** 

099 Firm (Boston)

075 Donn A. Randall

114 Mary Ellen Manganelli

#### \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Prior Time	Value	Currer Time	nt Value	Total Time	Value
114 Mary Ellen Manganelli	07/14/06	04/30/06			1.30	227.50	1.30	227.50
02 Associate Totals					1.30	227.50	1.30	227.50
Totals					2.10	395.50	2.10	395.50

#### \*\*\*\* Disbursements \*\*\*\* Thru 04/30/06

Class	Date	Attorney	Description	Amount	Bill
169 Federal Express/UPS				15.41	
Total Disbursemen	t			15.41	

Class	Prior	Current	Total
169 Federal Express/UPS		15.41	15.41
Totals		15.41	15.41

Case 1:05-cv-11686-WGY Document 39-3 Filed 08/Bulkley, Richardson and Gelinas, LLP - Boston Filed 08/03/2006 Page 17 of 21

**Billed Billing Memorandum** 

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney** Responsible Attorney 075 Donn A. Randall 099 Firm (Boston) 114 Mary Ellen Manganelli

**Total Time** Matter Total

395.50

410.91

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075 Donn A. Randall

# **Billed Billing Memorandum**

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

**Billing Attorney Originating Attorney** Responsible Attorney

099 Firm (Boston) 114 Mary Ellen Manganelli

Time Thru 06/30/06

Date	Attorney	Time	Rate	Value Diary	Print Bill	Add Total	No Chg
05/03/06	103 J. Patrick Kennedy	0.30	210	63.00 Email update from Ms. Man regarding status and proceed foreclosure	-	Yes	No
	Total For Month	0.30		63.00			
06/06/06	103 J. Patrick Kennedy	0.50	210	105.00 Telephone conferences with Young's clerk regarding filing attorneys' fees and confer with Manganelli regarding same	g motion for vith Ms.	Yes	No
06/06/06	114 Mary Ellen Manganelli	0.30	175	52.50 E-mail to Ms. Croll regarding		Yes	No
06/07/06	103 J. Patrick Kennedy	0.30	210	63.00 Email messages to and from regarding	n client Yes	Yes	No
	Total For Month	1.10		220.50	•		
	Total Time	1.40		26,405.50			

# \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Pri Time	or Value	Cur Time	rent Value	To Time	「otal Value	
103 J. Patrick Kennedy	07/14/06	06/07/06	0.30	63.00	0.80	168.00	1.10	231.00	
01 Partner Totals			0.30	63.00	0.80	168.00	1.10	231.00	

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Bulkley, Richardson and Gelinas, LLP - Bosto Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney
Originating Attorney
Responsible Attorney

075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

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# \*\*\*\* Attorney Summary \*\*\*\*

Attorney	Last Diary	Last Entry	Pric Time	or Value	Cur	rent Value	To Time	tal Value
114 Mary Ellen Manganelli	07/14/06	06/06/06			0.30	52.50	0.30	52.50
02 Associate Totals					0.30	52.50	0.30	52.50
Totals			0.30	63.00	1.10	220.50	1.40	283.50

# \*\*\*\* Disbursements \*\*\*\* Thru 06/30/06

Class	Date	Attorney	Description	Amount	Print Bill	
129 Photocopies				1.00		
169 Federal Express/UPS				9.65		
199 -	04/28/06	114 MEM	Vendor 865: Marsh, Moriarty, Ontell &, Voucher 46460 Outside Services	55.00	Yes	
		19	9 - Total	55.00		
Total Disbursement						

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Bulkley, Richardson and Gelinas, LLP - Boston Billed Billing Memorandum

Client 26021 Washington Mutual Bank

Date 07/20/06

Matter 00026 Washington Mutual Bank v. Dan W. Adams and

Heidi K. Adams - File No. 2005-130-786-064004

In House Counsel: Leigh Ann Lucero

Billing Attorney
Originating Attorney

Responsible Attorney

075 Donn A. Randall 099 Firm (Boston)

114 Mary Ellen Manganelli

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#### \*\*\*\* Disbursement Summary \*\*\*\*

Class	Prior	Current	Total
129 Photocopies	1.00		1.00
169 Federal Express/UPS		9.65	9.65
199 -	55.00		55.00
Totals	56.00	9.65	65.65

Total Time 283.50
Matter Total 349.15

Comment:

5/14/04 - PUT ALL BILLS IN ONE ENVELOPE ADDRESSED TO:

Billing Coordinator Washington Mutual

Legal Department, WMT2106

1201 Third Avenue Seattle, WA 98101

Each matter needs a Washington Mutual file number in the re:line and also add the name of the - In House Counsel - in the re:line

Invoices that are less than \$100.00 should only be sent if they are final invoices. Lexis, Westlaw and overtime must be pre-approved - 5/10/05 - EGA wants these charges billed.

Will not pay for messenger and meals - These are not set-up as "no charge" per Elvira Bill in .10 hour increments

Separate entries

After posting bills, prepare coversheet which is in Excel document #249795

Print out a billing history and check "Inception to date figures" and attach it to a copy of the spreadsheet for our records

12/7/04 - At the bottom of the bill - Inception to date figure will print out automatically

		Case 1	:05	-cv-11	686-W	3Y	Document 3	9-3	Filed 08/03/20	06	Page 21 of 21	
Page 1			Diary	Email correspondence with client and Ms. Manganelli regarding	E-mails to and from Ms. Croll regarding							
			N/C	N <sub>o</sub>	S S							
			Hold	0 Z	ON							
_			Add	Yes	Yes							
ardson and Gelinas, LLP - Boston Client Matter Inquiry	Client Matter Inquiry Time - Unbilled Details		Value Print	84.00 Yes	70.00 Yes	154.00						
Bulkley, Richardson and Gel		įqį	Rate	210.00	175.00							
Buík		\dams and He	Time	0.40	0.40	08.0						
		Client - 26021 Washington Mutual Bank Matter - 26 Washington Mutual Bank v. Dan W. Adams and Heidi	Attorney	103 JPK	114 MEM	Totals:						
Date July, 2006	IIMe 02:13 PM	Client - 26021 Matter - 26 Wa	1	90,	07/06/06 11						RED	ACTED